

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SEAMOUNT INTERNATIONAL	:
ASSOCIATION LTD.,	:
	: 06 CV 5648 (LTS)
Petitioner,	:
	: ECF CASE
- against -	:
	:
	: NOTICE OF MOTION
	: FOR LEAVE TO FILE
KUEHNE & NAGEL LTDA.,	: <u>VERIFIED AMENDED PETITION</u>
	:
Respondent.	:
-----X	

TO THE RESPONDENT NAMED ABOVE:

PLEASE TAKE NOTICE, pursuant to Federal Rule of Civil Procedure 15, that Petitioner Seamount International Association Ltd., by its attorneys Tisdale & Lennon, LLC, upon the annexed Declaration of Nancy R. Peterson, the exhibits annexed thereto, the accompanying Memorandum of Law, and the pleadings previously had herein, will move this Court, before the Honorable Laura Taylor Swain at the United States District Court House, 500 Pearl Street, New York, New York, at a time and place to be established by the Court, for leave of court to file an amended Verified Petition.

Dated: Southport, CT
December 29, 2006

Tisdale & Lennon, LLC
Attorneys for Petitioner
SEAMOUNT INTERNATIONAL ASSOCIATION
LTD.

By: 

Nancy R. Peterson (NP 2871)

Patrick F. Lennon (PL 2162)

11 W. 42nd St., Suite 500

New York, NY, 10036

(212) 354-0025

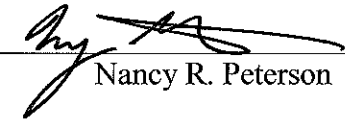
(212) 869-0067 – fax

plennon@tisdale-lennon.com

npeterson@tisdale-lennon.com

CERTIFICATION OF SERVICE

Nancy R. Peterson, an attorney duly admitted to practice before this Honorable Court, affirms as follows: The foregoing NOTICE OF MOTION will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.



Nancy R. Peterson